

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
-v-)	No. 07 CR 837
)	Hon. Elaine Bucklo
CHRISTOPHER G. KELLY,)	Mag. Judge Schenkier
)	
Defendant.)	

**DEFENDANT S MOTION FOR PRODUCTION
OF SUMMARY OF EXPERT S TESTIMONY AND STATEMENTS**

NOW COMES the Defendant, Christopher G. Kelly, by and through his attorneys, MONICO, PAVICH AND SPEVACK, and pursuant to Rule 16(a)(1)(E) of the Federal Rules of Criminal Procedure, respectfully requests that the Court enter an order requiring the Government to produce a written summary of the testimony of any and all experts it intends to call at trial, their work papers, and any statements of such witnesses. This request includes but is not limited to experts in the area of accounting and tax preparation.

IN SUPPORT of this Motion, the Defendant states as follows:

a. Rule 16(a)(1)(E) states:

At the defendant s request the government shall disclose to the defendant a written summary of testimony the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence during its case in chief at trial. This summary must describe the witnesses opinions, the bases and the reasons thereof, and the witnesses qualifications.

2. Likewise, the defendant requests that if the government calls expert witnesses the defendant requests that the government produce all material required by Rule 16(a)(1)(E) as soon as reasonably possible.
3. The defendant also moves the Court to require the Government to provide, as part of its production pursuant to 18 U.S.C. Section 3500, any statements of its expert witnesses.

Respectfully submitted,
Christopher G. Kelly

/s/ Barry A. Spevack

By: One of Defendant s Attorneys

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